### UNITED STATES DISTRICT COURT

### SOUTHERN DISTRICT OF TEXAS

### VICTORIA DIVISION

UNITED STATES OF AMERICA 

CRIMINAL NO. V-16-77

RAMON DELACRUZ JR

# **GOVERNMENT'S MOTION FOR LEAVE OF COURT TO FILE** LATE OBJECTION TO PRE-SENTENCE REPORT

COMES NOW, the United States of America, by and through Ryan K. Patrick, the United States Attorney for the Southern District of Texas, and Patti Hubert Booth, Assistant United States Attorney, and respectfully request leave to file Late Objection to the Presentence Report.

Respectfully submitted,

RYAN K. PATRICK **UNITED STATES ATTORNEY** 

By: s/ Patti Hubert Booth

PATTI HUBERT BOOTH

**Assistant United States Attorney** 

312 S. Main, Room 226

Victoria, TX 77901 Phone: (361) 576-9988

Fax: (361) 579-6820

State Bar ID No. 02650500

Federal I.D. No. 19500

## CERTIFICATE OF SERVICE AND CONSULTATION

I, Patti Hubert Booth, attorney for the government, hereby certify that copies of the Government's Motion for Leave to File Late Objection To Presentence Report has been electronically mailed to the following to Fabian Guerrero, attorney for the Defendant, and Tricia Cruz, United States Probation Officer on July 11, 2018.

s/ Patti Hubert Booth
PATTI HUBERT BOOTH
Assistant United States Attorney

## **CERTIFICATE OF CONSULTATION**

I hereby certify that I consulted with the following: Fabian Guerrero Attorney for Defendant, who is unopposed to this motion.

s/ Patti Hubert Booth
PATTI HUBERT BOOTH
Assistant United States Attorney